

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

IN RE NEW ENGLAND COMPOUNDING  
PHARMACY, INC. PRODUCTS  
LIABILITY LITIGATION

MDL No. 2419  
Dkt. No. 1:13-md-2419 (RWZ)

THIS DOCUMENT RELATES TO:

All Actions Naming The Saint Thomas  
Outpatient Neurosurgical Center

**PLAINTIFFS' STEERING COMMITTEE'S MOTION FOR DISTRIBUTION OF  
COMMON BENEFIT FEES AND EXPENSES RELATED TO SAINT THOMAS CASES**

The Plaintiffs' Steering Committee hereby seeks an order from this Court (i) approving an eight percent (8%) assessment from available funds from the Saint Thomas Qualified Settlement Fund; (ii) approving the payment of reasonable expenses made in support of common benefit efforts as recommended by the PSC, and (iii) approving the allocation and payment of reasonable attorneys' fees to specified firms in amounts determined by the PSC to be reasonable and appropriate for common benefit efforts and in accordance with this Court's prior orders. The grounds therefore are set out in the accompanying memorandum filed herewith and the PSC's proposed allocation of this common benefit assessment is attached as Exhibit A to the contemporaneously filed memorandum of law in support of this Motion.

A proposed order granting this motion is also filed contemporaneously herewith, and attached hereto as Exhibit A..

Dated: June 30, 2017

Respectfully submitted,

**/s/ J. Gerard Stranch, IV**

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*Plaintiffs' Steering Committee*

**CERTIFICATE OF SERVICE**

I, J. Gerard Stranch, hereby certify that I caused a copy of the foregoing to be filed electronically via the Court's electronic filing system. Those attorneys who are registered with the Court's electronic filing system may access these filings through the Court's system, and notice of these filings will be sent to these parties by operation of the Court's electronic filing system.

Dated: June 30, 2017

**/s/ J. Gerard Stranch, IV**  
J. Gerard Stranch, IV